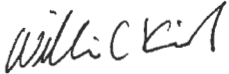


Approved: 
 William C. Kinder
 Assistant United States Attorney

Before: THE HONORABLE VALERIE FIGUEREDO
 United States Magistrate Judge
 Southern District of New York

23 MAG 1374

| | | |
|--------------------------|---|--------------------------------|
| ----- | X | |
| | : | <u>SEALED COMPLAINT</u> |
| UNITED STATES OF AMERICA | : | |
| | : | Violations of |
| - v. - | : | 18 U.S.C. §§ 2113(a) and 2 |
| | : | |
| RICHARD MARRERO, | : | COUNTY OF OFFENSE: |
| | : | NEW YORK |
| Defendant. | : | |
| ----- | X | |

SOUTHERN DISTRICT OF NEW YORK, ss.:

ALEXANDER LOIZIAS, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI"), and a member of the FBI-New York City Police Department ("NYPD") Joint Violent Crime Task Force, and charges as follows:

COUNT ONE
(Bank Robbery)

1. On or about February 6, 2023, in the Southern District of New York and elsewhere, RICHARD MARRERO, the defendant, by force and violence, and by intimidation, knowingly did take, and attempt to take, from the person and presence of another, property and money and other things of value belonging to, and in the care, custody, control, management, and possession of a bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation, to wit, MARRERO stole money from a particular bank ("Bank-1") by threatening harm to a bank teller who was working at a branch of Bank-1 in the vicinity of 3899 Sedgwick Avenue in the Bronx, New York.

(Title 18, United States Code, Sections 2113(a) and 2.)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

2. I have been a Special Agent with the FBI for approximately three years, and I am currently a member of the FBI-New York City Police Department Joint Violent Crime Task Force (the "Task Force"). I have been personally involved in the investigation of this matter. This affidavit is based upon my conversations with other law enforcement officers and witnesses; my examination of surveillance videos, photographs, law enforcement reports, and other law

enforcement records; and my involvement in this investigation. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

The Bank Robbery

3. The Task Force is investigating a bank robbery that occurred at a branch of Bank-1 in the vicinity of 3899 Sedgwick Avenue in the Bronx, New York, on or about February 6, 2023 (the "Bank Robbery").

4. Based on my conversations with other law enforcement officers and witnesses, and my review of law enforcement reports, surveillance video, and photographs, I have learned the following about the Bank Robbery:

a. On or about February 6, 2023, at approximately 11:28 a.m., an individual (the "Robber") entered a branch of Bank-1 in the vicinity of 3899 Sedgwick Avenue in the Bronx (the "Bank"). Surveillance video shows the Robber wearing a dark blue jacket, blue jeans, a dark-colored knit hat, plastic gloves, a white surgical mask, and a black backpack, and carrying a cane and a tote bag. A still image from surveillance video of the Robber entering the Bank is below.



b. Based on my review of law enforcement records and conversations with witnesses, I know that the Robber approached a Bank teller and displayed what appeared to be a small black handgun. He demanded money from the teller and stated, in sum and substance, that if the teller did not give him money quickly, that someone would "get hurt."

c. Based on my conversations with witnesses, I know that in response to the Robber's demand and fearing for her life, the teller handed the Robber approximately 214 U.S. dollars from her drawer. The cash that the teller handed to the Robber contained an anti-theft

device known as a “dye-pack.” A still image from surveillance video of the Robber holding stolen cash at the teller window is below.



d. The Robber then fled the Bank on foot. He turned north on Sedgwick Avenue and then west on Van Cortlandt Avenue West. Surveillance video shows that moments after exiting the Bank, at the corner of Sedgwick Avenue and Van Cortlandt Avenue West, the dye-pack contained in the stolen cash exploded inside of the Robber's front-right jacket pocket. The dye-pack explosion covered the cash and the Robber's clothes, hands, bag, cane, and other apparel in red dye. Still images from surveillance video showing the explosion of the dye-pack are below.



The Robber's Flight

5. Based on my review of surveillance video footage, I have learned the following about the Robber's flight from the scene of the Bank Robbery:

a. After the dye-pack exploded, the Robber continued to flee west on Van Cortlandt Avenue West, and then turned north on Orloff Avenue. A still image from surveillance video of the Robber fleeing north on Orloff Avenue is below.



b. On Orloff Avenue, a residential street with less vehicle traffic than Van Cortlandt Avenue West, the Robber discarded multiple of his dye-stained items. As shown on surveillance video, the Robber discarded his gloves, tote bag, and hat in front of 3960 Orloff Avenue on the east side of the street. At the same location, he attempted, unsuccessfully, to stuff his dye-stained cane through a sewer grate. Each of those items was recovered by law enforcement, photographs of which are below.

Robber's Tote Bag & Gloves



Robber's Cane



Robber's Hat



c. As shown on surveillance video, the Robber then crossed over to the west side of Orloff Avenue and discarded the dark blue jacket and handgun in front of 3961 Orloff Avenue. Those items were also recovered by law enforcement. Upon examination by law enforcement, the handgun was determined to be a fake firearm. Photographs of the discarded dark blue jacket and fake firearm are below.

Robber's Dark Blue Jacket



Robber's Fake Firearm



d. After discarding the dark blue jacket and fake firearm, the Robber turned south on Orloff Avenue and ran back toward Van Cortlandt Avenue West. Surveillance video shows the Robber wearing blue jeans, a gray hooded sweatshirt, and carrying his black backpack

in his right hand. Still images from surveillance video of the Robber heading south on Orloff Avenue are below.



e. When the Robber reached Van Cortlandt Avenue West, he turned right and headed west. He fled on foot for approximately a quarter mile until he reached the intersection of Van Cortlandt Avenue West and Bailey Avenue. There, the Robber got into the back passenger door of a black sedan (the "Black Sedan"). Still images from surveillance video of the Robber entering the Black Sedan is below.



f. Based on my review of surveillance video footage, I know that after the Robber entered the Black Sedan, the Black Sedan made a U-turn and traveled south on Bailey Avenue for approximately one mile. The Black Sedan then turned left onto West Kingsbridge Road. It traveled east for approximately a half mile and then turned south onto University Avenue. A still image from surveillance video of the Robber in the rear passenger seat of the Black Sedan traveling east on West Kingsbridge Road is below.



g. As shown on surveillance video, the Black Sedan then pulled over in front of 2553 University Avenue and the Robber exited the vehicle. He proceeded to walk southbound on University Avenue. A still image from surveillance video of the Robber walking southbound on University Avenue is below. The Robber is carrying the black backpack and wearing a gray sweatshirt with "USA" on the front, and red dye is visible on the Robber's sweatshirt and blue jeans.



h. Surveillance video shows that the Robber then stopped at a white transportation van (the "White Transport Van") parked in front of 2545 University Avenue. Based on my review of surveillance video and records obtained in the course of this investigation, I know that the White Transport Van bears New York license plate 35402LV, is labeled Van "#185," and is owned by a particular transportation company .

i. Once the Robber reached the White Transport Van, he made a phone call and entered and sat in the front passenger seat for a few minutes. He then exited and entered the

building at 2545 University Avenue. Still images from surveillance video of the Robber approaching, entering, and exiting the White Transport Van are below.



j. Surveillance video from the interior of 2545 University Avenue shows that upon entering the building, the Robber briefly spoke to security and then walked to the restroom in the building's front lobby. After approximately five minutes in the restroom, the Robber walked out of the restroom and exited the building. As shown in the still images below, surveillance video of the Robber exiting 2545 University Avenue captured a clear picture of the Robber's face, clothes, and red dye stains on his sweatshirt and blue jeans.



k. After exiting 2545 University Avenue, the Robber re-entered the White Transport Van. Surveillance video shows that the Robber remained inside the White Transport Van for approximately eight minutes. When he exited, he was wearing a rust-colored sweatshirt, dark blue pants, and a baseball cap. Still images of the Robber entering and exiting the White Transport Van after using the restroom at 2545 University Avenue are shown below.



l. As captured on surveillance video, the Robber then walked from the White Transport Van to a residential apartment building located at 75 West 190th Street. From 2545 University Avenue, the Robber walked east on West 192nd Street for one block. He turned south on Aqueduct Avenue and walked for one block. He then turned west on West 190th Street and entered the apartment building at 75 West 190th Street.

m. In the lobby of 75 West 190th Street, the Robber was met by another individual ("Individual-1"). The Robber and Individual-1 then went to the third floor and entered Apartment 3H. A still image of the Robber entering Apartment 3H is below.



n. Approximately one and a half hours later, at approximately 1:30 p.m., the Robber exited Apartment 3H with another cane. The Robber walked back to the White Transport

Van, which was still parked at 2545 University Avenue, entered the vehicle, and pulled away. Still images from surveillance video of the Robber exiting Apartment 3H, walking to the White Transport Van, and driving away are below.



Identification of RICHARD MARRERO as the Robber

6. I believe that RICHARD MARRERO, the defendant, is the Robber. The bases for that conclusion are as follows:

a. As depicted below, a known law enforcement photograph of MARRERO matches the appearance of the Robber exiting 2545 University Avenue with red dye stains on his clothes.

RICHARD MARRERO

Robber Exiting 2545 University Avenue



b. Based on my review of law enforcement records, I have learned that MARRERO was convicted in 2014 of committing multiple armed bank robberies in the Bronx and elsewhere. He is currently serving a term supervised release relating to those crimes, with the U.S. Probation Office in the Southern District of New York.

c. Based on my review of law enforcement databases, I believe that 75 West 190th Street, Apartment 3H—that is, the same apartment building and unit that the Robber entered and exited following the Bank Robbery—is MARRERO's residence.

d. On or about July 19, 2022, MARRERO received an NYPD summons for making an improper left turn on a one-way roadway on East 138th Street in the Bronx. The summons identifies MARRERO's address as 75 West 190th Street in the Bronx—that is, the same apartment building that the Robber entered and exited following the Bank Robbery.

e. Law enforcement records describe MARRERO as approximately 6 feet, 2 inches tall and weighing approximately 240 pounds. That description matches the appearance of the Robber from surveillance video and the bank teller's description of the Robber.

f. Surveillance video from 75 West 190th Street prior to the Bank Robbery shows an individual matching MARRERO's description exiting Apartment 3H and wearing the same style dark blue jacket as the jacket worn by the Robber, and carrying a cane like the Robber. Still images from surveillance video of the individual leaving Apartment 3H in the morning before the Bank Robbery are below.




7. Based on my review of publicly available materials and my training and experience as a Special Agent with the FBI, I know that at all relevant times the deposits of Bank-1 were insured by the FDIC.

WHEREFORE, I respectfully request that a warrant be issued for the arrest of RICHARD MARRERO, the defendant, and that he be arrested, and imprisoned or bailed, as the case may be.

Alexander Loizias (by VF with permission)
ALEXANDER LOIZIAS
Special Agent
Federal Bureau of Investigation

Sworn to me through the transmission of
this Complaint by reliable electronic
means (telephone), this 21 day of February, 2023.



THE HONORABLE VALERIE FIGUEREDO
United States Magistrate Judge
Southern District of New York